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March 15, 2002

Mr. Joel H. Peck, Clerk
State Corporation Commission
Document Control Center
Post Office Box 2118
Richmond, Virginia 23216

Re: Verizon Virginia Inc. Section 271 Filing

Dear Mr. Peck:

Enclosed please find the original and 15 copies (3 paper copies and 12 cd roms) of the non-proprietary version of Verizon Virginia Inc.'s ("Verizon VA's") filing of information that establishes Verizon VA's compliance with the requirements of Section 271(c) of the Telecommunications Act of 1996 ("1996 Act"). Also included separately is an envelope with the proprietary version of certain portions of the filing.

This information will allow the Commission to review Verizon VA's compliance with section 271(c) and also to verify this compliance with the Federal Communications Commission ("FCC") when Verizon VA files its application for section 271 relief with that agency. *See* 47 U.S.C. § 271(d)(2)(B). These materials mirror as much as possible the information that Verizon VA expects to provide the FCC at the time that Verizon VA makes its federal filing.

Verizon VA has included in this filing a declaration that describes how Verizon meets the section 271(c) competitive checklist, as well as a declaration that describes Verizon's Operations Support Systems, which are the systems that assist CLECs in pre-ordering, ordering and provisioning, repair and maintenance, and billing operations.¹ The filing also includes a declaration describing the Virginia Carrier to Carrier Performance Standards and Reports, which provide a comprehensive set of performance measurements, standards and reports applicable to wholesale service provided by Verizon VA. Verizon VA has also provided the Commission with information regarding the state of local competition in Virginia in order to demonstrate that its application has satisfied the requirement of section 271(c)(1)(A) that there exist in Virginia a facilities-based competitor to Verizon VA.

Finally, by proving that it has complied with the requirements of section 271(c), Verizon VA has also demonstrated that its entry into the Virginia long distance market will be consistent

¹ Verizon VA has asked PricewaterhouseCoopers to attest to Verizon VA's management assertions regarding the quality of Verizon VA's electronic bill. Although this attestation is not necessary to demonstrate compliance with section 271(c), similar attestations have been provided in other states, and Verizon VA will provide it to this Commission in late May.

with the public interest. In drafting the 1996 Act, Congress delegated to the FCC the question of whether a particular section 271 application "would be consistent with the public interest, convenience, and necessity."² In making this assessment, the FCC has concluded that "BOC entry into the long distance market will benefit consumers and competition if the relevant local exchange market is open to competition consistent with the competitive checklist."³ In fact, the FCC has ruled that once it has determined that the local market is open, it will not require a section 271 applicant "to make a substantial *additional* showing that its participation in the long distance market will produce public interest benefits."⁴ Thus, if this Commission concludes that Verizon VA has done its part to open the local market, there can be no legitimate conclusion but that Verizon VA's entry into the Virginia long distance market will be consistent with the public interest.

Verizon VA looks forward to a thorough and expeditious review. Thank you for your consideration.

Very truly yours,

A handwritten signature in cursive script, reading "Lydia R. Pulley".

Lydia R. Pulley

Enclosures

Copies to:

The Honorable Clinton Miller
The Honorable Theodore V. Morrison, Jr.
The Honorable Hullihen Williams Moore
Alexander F. Skirpan, Esquire
William Chambliss, Esquire
William Irby, Director, Division of Communications

² Compare 47 U.S.C. § 271(d)(3)(C) (stating that the FCC shall determine in part whether "the requested authorization is consistent with the public interest, convenience, and necessity.") with 47 U.S.C. § 271(d)(2)(B) (stating that the FCC "shall consult" with the State Commission of any state that is the subject of a section 271 application "in order to verify the compliance of the Bell Operating Company with the requirements of subsection (c) [of section 271].").

³ Memorandum Opinion and Order, *Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc, and Verizon Select Services Inc. for Authorization to Provide In-Region, InterLATA Services in Pennsylvania*, CC Docket No. 01-138, ¶ 125 (rel. Sept. 19, 2001).

⁴ Memorandum Opinion and Order, *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, CC Docket No. 99-295, ¶ 428 (rel. December 22, 1999).